

REMARKS

This Amendment is submitted in response to the First Office Action, mailed November 25, 2008. In this application, claims 1-40 were pending. With this Amendment, claims 37-40 are canceled. Claims 1, 17, 28-34, and 36 are amended. The remaining claims are unchanged. Accordingly, the claims now before the Examiner for consideration are claims 1-36.

The Applicant thanks the Examiner for acknowledgement of Applicant's Information Disclosure Statement, Oath/Declaration, and acceptance of the Applicant's drawings.

On page 2 of the Office Action, claims 38-40 were rejected under 35 U.S.C. § 112 because there was insufficient antecedent basis for a limitation of the claims. The Applicant has hereby canceled claims 38-40, thereby rendering this rejection moot.

On page 3 of the Office Action, claims 17-37 were rejected under 35 U.S.C. § 101 because the claimed invention was purportedly directed to non-statutory subject matter. Accordingly, independent claims 17 and 36 have each been amended to recite a processor and an output interface device, these physical hardware components interacting with the other claim elements. Such physical hardware components are described in the computing environment described with reference to Fig. 1. Moreover, remote computers of the wide area network are also understood to have the same physical hardware components. Independent claim 37 has been canceled. Accordingly, the Applicant respectfully submits that independent claims 17 and 36 and dependent claims 18-35 hereby recite statutory subject matter and request withdrawal of their rejection under 35 U.S.C. § 101.

On page 6 of the Office Action, claims 1-4, 6, 8, 10, 13-23, 25, 28-29, 31, and 35-40 were rejected under 35 U.S.C. § 102(e) as being anticipated by Williamson et al., U.S. Patent No. 6,704,744. Claims 37-40 are hereby cancelled. Each of independent claims 1, 17 and 36 recites "wherein at least one of the first and second data sets comprises aggregated data stored in an online analytical processing (OLAP) data warehouse." This limitation finds support in the original specification at, for example, paragraph [0040]. In one embodiment, discussed with reference to FIG. 12B, such a data warehouse is a business intelligence (BI) entity object model. (Paragraph

[0080]). Williamson does not teach such a data set comprising aggregated data stored in an online analytical processing (OLAP) data warehouse.

Referring to FIG. 12B of the current application, Williamson's database management schema is analogous to relational model 1264. Williamson's object classes are analogous to object model 1254. Williamson describes his invention as follows: "A model is defined that maps the object classes to the DBMS schema." (Column 3, lines 42-43). Accordingly, Williamson's model is analogous to object relational mapping 1256. Williamson's "model" is comprised of entities, attributes and relationships. An entity represents the primary structure of the model. An entity maps to an object class and to one or more tables of the DBMS. An entity contains attributes and relationships. (Col. 3, lines 49-53). A relationship joins data in various tables of the relational model (Column 4, lines 14-22). Referring to FIG. 12B of the current application, all of Williamson's relationships are defined by an object relational mapping 1256 between the data and relational model 1264 and the objects in object model 1254.

In sharp contrast, each of the independent claims of the pending application refer to data sets comprising aggregated data stored in an online analytical processing data warehouse, such as an object model for BI entities 1262. As discussed in paragraphs [0076-0081], for example, the object model for BI entities 1262 is generated by business intelligence entity generator 1260 from dimensional model 1258. Dimensional model 1258 is itself produced by model services 1250 taking, as inputs, a set of focal points 1252, an object description 1254 and set of persistent data store mappings 1256. (paragraph [0076]).

Williamson deals only with an object model 1254, a relational model 1264 that includes tables in a DBMS and a model that maps between the object model 1254 and the relational model 1264, analogous to our object relational mapping 1256. Thus, there is no teaching of the claimed aggregated data or on-line analytical processing data warehouse. Because this limitation is recited in each independent claim, Williamson does not anticipate independent claims 1, 17 or 36 or their dependent claims 2-4, 6, 8, 10, 13-16, 18-23, 25, 28-29, 31 or 35. Accordingly, the Applicant respectfully requests withdrawal of the rejection of these claims under 35 U.S.C. § 102(e).

On page 14 of the Office Action, claims 5, 7, 9, 11-12, 24, 26-27, 30, 32, and 33 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Williamson in view of Carlson et al., U.S. Patent No. 6,173,439. Independent claims 1, 17 and 36 have been discussed with respect to Williamson above. While Carlson discloses that an interface can be used so an attribute may reside in one object and yet may be accessed by objects at different levels in the object tree (abstract), this disclosure does not, even when combined with the teachings of Williamson, render obvious a limitation “wherein at least one of the first and second data sets comprises aggregated data stored in an on-line analytical processing (OLAP) data warehouse,” as claimed and discussed above.

Moreover, each of independent claims 17 and 36 recites “a plurality of data navigation providers each associated with a specific type of navigation.” Such a plurality of providers is discussed with reference to FIG. 15, for example. Moreover, exemplary types of navigation are discussed in paragraphs [0044-0065], including the following types: “drill down,” “drill up,” “drill to detail,” “drill across,” and “logic association.” Williamson does not teach such a plurality of data navigation providers. In the passage cited by the Office Action on page 9 for teaching this limitation, Williamson merely teaches relationship mapping between entities, without any disclosure of a type of navigation associated with such relationship. Moreover, Williamson does not disclose a plurality of data navigation providers, as claimed. Carlson does not remedy this defect. While Carlson does disclose “drill up” and “drill down” data access methods, it does not disclose the use of a plurality of data navigation providers, each navigation provider associated with a specific type of navigation, as claimed.

Further, at least some of the dependent claims recited limitations that in themselves are not rendered obvious by the combination of references. For example, claim 21 recites that “the navigation service layer is further configured to provide the user with an aggregated collection of navigation links that represent navigation links collected from multiple data navigation providers.” The passage of Williamson cited in the Office Action as teaching this limitation only teaches that various relationships may be mapped between entities. However, there is no teaching of presenting a user with a collection of navigatable links collected from multiple data navigation providers, as

claimed.

In view of the foregoing remarks, the Applicant respectfully submits that the entire application, including all pending claims 1-36, is allowable in view of the prior art of record. Accordingly, the Applicant respectfully requests Notice of Allowability of all pending claims.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

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